

EXHIBIT E

From: [Murphy, Lindsay M. \(CIV\)](#)
To: ["Ramya Krishnan"](#); ["Noam Biale"](#); ["Alexander A Abdo"](#); ["Alexandra Conlon"](#); ["Courtney Gans"](#); ["Jameel Jaffer"](#); ["Michael Tremonte"](#); ["Scott Wilkens"](#); ["Xiangnong Wang"](#); ["Talya R Nevins"](#); ["Jackson Busch"](#)
Cc: [Busen, Jesse \(CIV\)](#); [Hennes, Stefanie \(CIV\)](#); [Kanellis, William G. \(CIV\)](#); [Kanter, Ethan \(CIV\)](#); [Moss, Benjamin M. \(CIV\)](#); [Santora, Victoria M \(CIV\)](#); [Stone, Paul \(CIV\)](#); [Strokus, Jessica D. \(CIV\)](#); [Yen, Shawna \(USAMA\)](#)
Subject: RE: AAUP: Position on Motion to Seal Portion of AR Supplement
Date: Friday, June 13, 2025 5:59:00 PM
Attachments: [AAUP Responses to Plaintiffs First Set of Requests for Production FINAL.pdf](#)
[AAUP v. Rubio Defendants Prod Vol 01_6.13.25.pdf](#)
[image001.jpg](#)

Thanks, Noam and Ramya. And sorry for leaving some of your team members off my prior message. Attached, please find Defendants' responses and objections to your requests for production along with associated documents. We are still finalizing our responses to your ROGs and will have those to you as soon as possible, but likely not before Monday.

We are still waiting on agency approval to file one remaining document under seal. Because the document is law enforcement sensitive, the agency is not comfortable producing it without a protective order in place. So, we will be delayed in getting this document to you.

Best,

Lindsay

From: Ramya Krishnan

Sent: Friday, June 13, 2025 3:39 PM

To: Noam Biale ; Murphy, Lindsay M. (CIV) ; Alexander A Abdo ; Alexandra Conlon ; Courtney Gans ; Jameel Jaffer ; Michael Tremonte ; Scott Wilkens ; Xiangnong Wang ; Talya R Nevins ; Jackson Busch

Cc: Busen, Jesse (CIV) ; Hennes, Stefanie (CIV) ; Kanellis, William G. (CIV) ; Kanter, Ethan (CIV) ; Moss, Benjamin M. (CIV) ; Santora, Victoria M (CIV) ; Stone, Paul (CIV) ; Strokus, Jessica D. (CIV) ; Yen, Shawna (USAMA)

Subject: [EXTERNAL] Re: AAUP: Position on Motion to Seal Portion of AR Supplement

Hi Lindsay, just adding a few more lawyers from our team to this chain.

Ramya

From: Noam Biale <NBiale@shertremonte.com>

Date: Friday, June 13, 2025 at 2:40 PM

To: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>, Alexander A Abdo <alex.abdo@knightcolumbia.org>, Alexandra Conlon <Aconlon@shertremonte.com>, Courtney Gans <CGans@shertremonte.com>, Jameel Jaffer <jameel.jaffer@knightcolumbia.org>, Michael Tremonte <MTremonte@shertremonte.com>, Ramya Krishnan <ramya.krishnan@knightcolumbia.org>, Scott Wilkens <scott.wilkens@knightcolumbia.org>

Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>, Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>, Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>, Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>, Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>, Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>, Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>, Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>, Yen, Shawna (USAMA)

<Shawna.Yen@usdoj.gov>

Subject: Re: AAUP: Position on Motion to Seal Portion of AR Supplement

This Message Is From an External Sender

This message came from outside your organization.

Hi Lindsay,

No objection. Can you give us a sense of the volume of documents you'll be disclosing?

Noam



Noam Biale

90 Broad Street, 23rd Floor | New York, NY 10004

tel: 212.300.2445 | fax: 212.202.4156

nbiale@shertremonte.com

www.shertremonte.com

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

From: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>

Sent: Friday, June 13, 2025 2:09:39 PM

To: Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; jameel.jaffer <jameel.jaffer@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Noam Biale <NBiale@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; scott.wilkens <scott.wilkens@knightcolumbia.org>

Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>

Subject: AAUP: Position on Motion to Seal Portion of AR Supplement

Hi Noam,

We're finalizing our RFP responses and objections and should have them to you shortly. We also have some additional documents to share. Because at least one of the documents is law enforcement sensitive and non-public facing, and a general protective order has yet to be entered, we'd like to submit it as a sealed supplement to the AR so that it cannot be shared outside of this litigation. We're still evaluating two other documents to determine if they should be sealed as well. Do Plaintiffs have any objection to our motion to submit these documents under seal?

Thanks,

Lindsay